| 1 | UNITED STATES DISTRICT COURT |
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| 2 | FOR THE DISTRICT OF NEVADA |
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| 4 | Case No.: 2:18-CV-00673-JCM-PAL |
| 5 | STEVEN R. DAVIS, an individual, Plaintiffs, STIPULATION FOR EXTENSION OF TIME TO RESPOND TO |
| 6 | vs. DEFENDANT CENTURY LINK, INC.'S MOTION TO DISMISS |
| 7 | UNITEL VOICE, LLC, et al UNDER FED. R. CIV. P. 12(b)(2) FILED NOVEMBER 20 th , 2018. |
| 8 | Defendants. (First Request) |
| 9 | (First Request) |
| 10 | Plaintiff Steven R. Davis, pro se, and Century Link, Inc.'s through its undersigned |
| 11 | counsel of record, agree that upon the Court's approval, Plaintiff's response to Defendant |
| 12 | Century Link Inc.'s ¹ Motion to Dismiss, currently due on DECEMBER 4 TH , 2018 shall be due |
| 13 | 30 DAYS from that date, on JANUARY 4 TH , 2019 for the reasons set forth below: |
| 14 | 1. Defendant Century Link Inc's Motion to Dismiss was filed on November 20 th , |
| 15 | 2018. |
| 16 | 2. Plaintiff, via email has requested an Extension to January 4 th , 2019, to file his |
| 17 | response. |
| 18 | 3. Plaintiff is pro se and has limited access to legal resources and needs the |
| 19 | additional time to craft his response. |
| 20 | 4. Attorney Lauren D. Calvert communicated her assent. |
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| 1 | 5. Accordingly, Plaintiff and Defendant, Century Link, Inc. agree that, upon the |
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| 2 | Court's approval, Defendant's response to Plaintiff's Motion to Dismiss shall |
| 3 | be due on or before January 11 th , 2019. |
| 4 | 6. Furthermore, upon receipt of Plaintiff's response, the Defendant Century Link, |
| 5 | Inc. shall have seven days to reply. |
| 6 | 7. This Stipulation has been entered before the Motion is otherwise due. |
| 7 | 8. Pursuant to Local Rule 6-1, this is Plaintiff and Defendant's first request for an |
| 8 | extension of this deadline. |
| 9 | 9. The parties seek this extension in good faith and not for purposes of delay. |
| 10 | 10. No party would be prejudiced by the granting of this stipulated motion for an |
| 11 | extension of time. |
| 12 | Dated, this the 28th day of November 2018, by the undersigned Plaintiff and |
| 13 | counsel for Defendant, Century Link, Inc. |
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| 17 | /s/ Steve R. Davis |
| 18 | Steve R. Davis, Pro Per |
| 19 | 4038 Velarde Ct. Las Vegas, NV 89120 |
| 20 | (786) 753-1931 steverdavis@mail.com |
| 21 | steverdavis@man.com |
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| 1 | /s/ Lauren Calvert, Esq. |
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| 2 | /s/ M. CALEB MEYER, ESQ. |
| 3 | Nevada Bar No. 13379 LAUREN CALVERT, ESQ. |
| | Nevada Bar No. 10534 |
| 4 | MESSNER REEVES, LLP 8945 West Russell Road, suite 300 |
| 5 | Las Vegas, Nevada 89148 Telephone: 702-363-5100 |
| 6 | Facsimile: 702-363-5101 |
| 7 | Email: cmeyer@messner.com lcaslvert@messner.com |
| | Attorneys for Defendant, Century Link, Inc. |
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| 10 | <u>ORDER</u> |
| 11 | IT IS SO ORDERED. |
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| | Dated: December 3, 2018. |
| 13 | Xecus C. Mahan |
| 14 | U.S. District Judge |
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| 24 | Stipulation for Extension of Time to Respond to Motion to Dismiss |
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